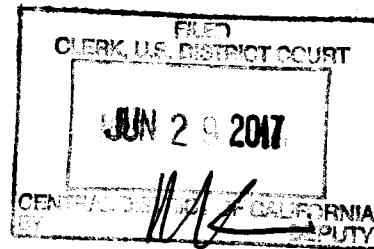


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15 Attorneys for Plaintiff  
16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 No. 17-MJ-1486-DUTY

21 Plaintiff,

22 GOVERNMENT'S NOTICE OF REQUEST FOR  
DETENTION

23 v.

24 MOISES MARTINEZ,

25 Defendant.

26 Plaintiff, United States of America, by and through its counsel  
27 of record, hereby requests detention of defendant and gives notice of  
the following material factors:

- 28
- 1. Temporary 10-day Detention Requested (§ 3142(d)) on the following grounds:
  - a. present offense committed while defendant was on release pending (felony trial),
  - b. defendant is an alien not lawfully admitted for permanent residence; and

1        c. defendant may flee; or

2        d. pose a danger to another or the community.

3        2. Pretrial Detention Requested (§ 3142(e)) because no  
4                          condition or combination of conditions will reasonably  
5                          assure:

6        a. the appearance of the defendant as required;

7        b. safety of any other person and the community.

8        3. Detention Requested Pending Supervised Release/Probation  
9                          Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C.  
10                         § 3143(a)):

11        a. defendant cannot establish by clear and convincing  
12                          evidence that he/she will not pose a danger to any  
13                          other person or to the community;

14        b. defendant cannot establish by clear and convincing  
15                          evidence that he/she will not flee.

16        4. Presumptions Applicable to Pretrial Detention (18 U.S.C.  
17                         § 3142(e)):

18        a. Title 21 or Maritime Drug Law Enforcement Act ("MDLEA")  
19                         (46 U.S.C. App. 1901 et seq.) offense with 10-year or  
20                         greater maximum penalty (presumption of danger to  
21                         community and flight risk);

22        b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or  
23                         2332b(g)(5)(B) with 10-year or greater maximum penalty  
24                         (presumption of danger to community and flight risk);

25        c. offense involving a minor victim under 18 U.S.C.  
26                          §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251,  
27                         2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4),

- e. any felony not otherwise a crime of violence that involves a minor victim or the possession or use of a firearm or destructive device (as defined in 18 U.S.C. § 921), or any other dangerous weapon, or involves a failure to register under 18 U.S.C. § 2250;

f. serious risk defendant will flee;

g. serious risk defendant will (obstruct or attempt to obstruct justice) or (threaten, injure, or intimidate prospective witness or juror, or attempt to do so).

6. Government requests continuance of \_\_\_\_\_ days for detention hearing under § 3142(f) and based upon the following reason(s) :

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7. Good cause for continuance in excess of three days exists in  
that:

Dated: June 29, 2017

Respectfully submitted,

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Acting United States Attorney

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Assistant United States Attorney  
Chief, Criminal Division

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